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EXPEDITE

MAY 2 1986

OFFICE OF
PESTICIDES AND TOXIC SUBSTANCES

MEMORANDUM

SUBJECT: Special Action Code 870 Maneb Data Call-In.
Revised Product labels. Letter of April 14,
1986. Accession No. NONE [RCB No. 872]

FROM: Martha J. Bradley, Chemist *M J Bradley*
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Hazard Evaluation Division (TS-769)

THRU: Charles L. Trichilo, Chief
Residue Chemistry Branch
Hazard Evaluation Division (TS-769)

TO: H. Jacoby, PM 21
Registration Division (TS-767C)

Susan Lewis, Data Call in
Registration Division (TS-767C)

Toxicology Branch
Hazard Evaluation Division (TS-769)

The Maneb Task Force has submitted proposals for revising mane b product labels while complete residue data are being developed. Certain details on cut off dates for the existing labels and the submission of production data are discussed as well as plans for the future submission of additional crop residue data to reinstate the crops dropped from the submitted revised label.

It was determined in a meeting April 21, 1986 between RCB, RD and OGC, that RD and OGC would comment on the proposals for the relabeling process and RCB would comment on the crop uses and revised label.

The revised maneb label lists use directions for the following tolerated crops: almonds, apples, bananas, grapes, lima beans, green and dry beans, cabbage, crops of the cucurbit crop group, sweet corn, lettuce, potatoes, tomatoes (greenhouse and field) and sugar beets. The Task Force letter states that residue data for these crops will be submitted to the Agency May 1, 1986. The remaining maneb tolerated crops do not appear on the revised label.

The revised label also lists crops for seed treatment uses, use on tobacco and ornamental plants. All of the crops for seed treatment, tobacco and ornamental plants on the revised label are also listed for these uses in the draft of the EPA Index to Pesticide Chemicals for maneb dated 10/31/85.

RD is to determine whether the application rates on the revised label conform to previously accepted labels (personnel communication with H. Jacoby). We note that application rates for many of the non-tree crops are given as quarts/100 gals with no limit on the dosage of pesticide per acre. Application rates for non-tree crops should be expressed in maximum dosage of the pesticide per acre.

In our memo of January 17, 1986, we noted that seed treatment uses are no longer considered to be non-food uses unless the requirements in the Residue Chemistry Guidelines, Subdivision O, paragraph 171-12 are met. Use directions for the seed treatments should be given.

We also noted in the January 17, 1986 memo that the tobacco use should be supported by residue data (Residue Chemistry Guidelines, Subdivision O, paragraph 171-11).

In our previous memo, see above, we stated that the feeding restrictions for almond hulls and sweet corn forage are not practical and that these uses should be supported with appropriate residue data.

The Task Force letter also states that all available residue data developed on the remaining 28 crops will be submitted by December 15, 1986. The Task Force proposes that the remaining 28 crops be returned to the product labels if the new data meet the requirements of the October 19, 1984 Data Call In Notice and if maneb registrations remain in good standing. The letter further states that if additional data are submitted after December 15, 1986, the Agency would expeditiously determine compliance with the October 19, 1984 Notice. RCB has been requested to furnish a date to Special Review Branch, Registration Division, for when the additional 28 crops can be returned to the maneb label.

RCB cannot determine when the remaining 28 crops can be returned to the maneb label. The date when the crops could be returned to the label will depend on, 1) when the data are submitted, 2) the amount of data submitted, 3) whether HED expedites the data review, and 4) the review time needed at the branch, division, OPP and OPTS levels to determine whether the residues found are safe. The return of the remaining 28 crops to the maneb label should depend on whether the data meet Residue Chemistry Guidelines requirements and other Agency guidelines and on whether maneb registrations remain in good standing. The latter requirement will depend on the findings of the Registration Standard for maneb that is due in August, 1986.

RCB:TS-769:M.Bradley:vg:CM#2:Rm804:X77484:5/1/86
cc: Reviewer, Maneb SF, RF, Circu, J.Bakst (RD), Amy Rispin, PMSD/ISB
RDI: R.Schmitt, 4/29/86; R.Quick, 4/29/86